

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

JESSE ADAMS AND JENNIFER MCEWEN,
Plaintiffs,
v.
AVAST SOFTWARE, INC., a corporation,
Defendant.

Civil Action No. 2:22-cv-00012

**SECOND STIPULATED MOTION
FOR AN ORDER EXTENDING TIME
FOR DEFENDANT TO MOVE,
PLEAD, OR OTHERWISE RESPOND
TO COMPLAINT BY 21 DAYS TO
FEBRUARY 21, 2022**

**NOTE ON MOTION CALENDAR:
January 28, 2022 (Local Rule 7(d)(1))**

SECOND STIPULATED MOTION TO EXTEND TIME - 1

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1 Pursuant to Local Civil Rules 7(j) and 10(g), defendant Avast Software, Inc. ("Avast")
2 and plaintiffs Jesse Adams and Jennifer McEwen ("Plaintiffs") hereby submit this stipulated
3 motion to extend Avast's time to move, plead, or otherwise respond to the Complaint by 21 days,
4 to February 21, 2022.

5 WHEREAS, the parties previously stipulated to extend Avast's time to move, plead, or
6 otherwise respond to the Complaint in order to discuss a potential resolution.

7 WHEREAS, pursuant to the Court's order dated January 12, 2022, Avast's deadline to
8 move, plead, or otherwise respond to the Complaint was extended to January 31, 2022.

9 WHEREAS, good cause exists to extend Avast's deadline to move, plead, or otherwise
10 respond to the Complaint to February 21, 2022, because the parties have reached a settlement in
11 principle, but need additional time to finalize documentation of the settlement and dismissal of
12 this action, and the extension will allow the parties and the Court to avoid the potentially needless
13 expenditure of resources on unnecessary motion practice in response to the Complaint pending
14 finalization of the settlement.

15 WHEREAS, by entering into this stipulation, Avast does not submit to the jurisdiction of
16 this Court and does not waive any right or defense, including the defenses of lack of personal
17 jurisdiction and improper venue.

18 WHEREAS, this stipulated motion is filed in good faith and not for purposes of delay,
19 and will not alter any dates or schedules previously set by this Court.

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among
21 Plaintiffs and defendant Avast, subject to the Court's approval, that the deadline for Avast to
22 move, plead, or otherwise respond to the Complaint is extended by 21 days to February 21, 2022.

23 Dated: January 28, 2022

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SECOND STIPULATED MOTION TO EXTEND TIME - 2

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5 Attorneys for Defendant
6 AVAST SOFTWARE, INC.
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Dated: January 28, 2022

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11 Dan Kalish
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18 Attorneys for Plaintiffs
19 JESSE ADAMS AND JENNIFER MCEWEN
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ORDER

IT IS SO ORDERED.

DATED this 28th day of January, 2022.



18 RICARDO S. MARTINEZ
19 CHIEF UNITED STATES DISTRICT JUDGE
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SECOND STIPULATED MOTION TO EXTEND TIME - 3

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